

HBG, STANDARD

**U.S. District Court**  
**United States District Court for the Middle District of Pennsylvania (Harrisburg)**  
**CIVIL DOCKET FOR CASE #: 1:06-cv-01777-SHR**  
**Internal Use Only**

**SOLICITOR**

**MAY 15 2007**

QRG, Ltd., a/k/a Quantum Research Group, Ltd. v.  
 NARTRON CORPORATION  
 Assigned to: Honorable Sylvia H. Rambo  
 Case in other court: U.S. District Court, Western District of  
 PA, 2:06-CV-500  
 Cause: 28:2201 Declaratory Judgement

Date Filed: 09/12/2006 **U.S. PATENT & TRADEMARK OFFICE**  
 Jury Demand: Both  
 Nature of Suit: 830 Patent  
 Jurisdiction: Federal Question

**Plaintiff**

**QRG, LTD.**  
*a/k/a Quantum Research Group, Ltd.*

represented by **Andrew E. Falsetti**  
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**Pat. # 4,731,548**  
**4,758,735**  
**5,796,183**  
**4,831,279**  
**5,087,825**

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V.

**Defendant**

**NARTRON CORPORATION**

represented by **Mark D. Chuey**  
 Brooks Kushman P.C.  
 1000 Town Center

3. Defendant Nartron is located at 5000 North US-131, Reed City, Michigan.

Upon information and belief, Defendant is doing business, has carried out substantial business, and has had other substantial contacts within this judicial district.

4. This Court has jurisdiction over the subject matter of this action under the provisions of 28 U.S.C. §§ 1331, 1332(a)(2), 1338(a), 2201 and 2202, and venue is proper under 28 U.S.C. §§ 1391(b) and (c).

#### **COUNT I – DECLARATORY JUDGMENT**

5. Defendant claims to be the owner of United States Letters Patent Nos. 4,731,548 (“the ‘548 Patent”), 4,758,735 (“the ‘735 Patent”), 5,796,183 (“the ‘183 Patent”), 4,831,279 (“the ‘279 Patent”), and 5,087,825 (“the ‘825 Patent”), hereinafter referred to collectively as “the Patents.”

6. Defendant and its primary shareholder, Norman Rautiola, have a reputation for being litigious, and aggressively pursuing even dubious infringement claims.

7. Defendant has repeatedly threatened Plaintiff, both in writing and orally, with patent infringement. Defendant, for example, wrote that Plaintiff’s Form QProx product “is obviously an infringement of our patented technology” and declared that “[w]e intend to pursue this claim of infringement and suggest that you immediately contact our attorney . . . .”

8. Defendant’s litigious nature was not diminished by its filing for Chapter 11 bankruptcy. Defendant petitioned the bankruptcy court so Nartron could employ a law firm to prosecute patent infringement actions on a contingency fee basis during its reorganization.

9. Defendant's eventual emergence from bankruptcy enabled Nartron to continue its string of infringement suits, and upon information and belief, Defendant is currently engaged in at least two other patent litigations.

10. Despite Defendant's threats to the contrary, Plaintiff has not infringed any valid claim of the Patents as properly construed.

11. Furthermore, by virtue of the proceedings in the United States Patent and Trademark Office during prosecution of the Patents, and by virtue of the admissions, representations and concessions made by or on behalf of the named inventors and their representatives, Defendant is estopped from construing any claims of the Patents to cover any product made, used, sold, or offered for sale by Plaintiff.

12. Plaintiff further alleges that each of the claims of the Patents is invalid and/or unenforceable and of no legal effect against Plaintiff for failure to comply with the Patent Statute including, but not limited to, 35 U.S.C. §§ 102, 103 and 112 and/or because the alleged inventors and owner of the Patent and/or their attorneys failed to properly discharge their duty of candor and good faith in their dealings with the United States Patent and Trademark Office.

13. By reason of the foregoing, an actual controversy between Plaintiff and Defendant exists as to the alleged infringement, validity, and enforceability of the Patents.

WHEREFORE, Plaintiff prays for the following relief:

1. That the Court enter judgment declaring that Plaintiff's capacitive touch sensor products have not and do not infringe any valid and enforceable claim of United States Letters Patent Nos. 4,731,548, 4,758,735, 5,796,183, 4,831,279, and 5,087,825;
2. That the Court declare that the claims of United States Letters Patent Nos. 4,731,548, 4,758,735, 5,796,183, 4,831,279, and 5,087,825 are invalid and the Patents unenforceable;
3. That the Court enter judgment declaring this case to be exceptional pursuant to 35 U.S.C. § 285; and
4. That the Court award to Plaintiff counsel fees, costs, and all other relief that the Court deems appropriate.

DATED: April 13, 2006

/s/ Andrew E. Falsetti

Gene A. Tabachnick

PA I.D. # 73032

Frederick H. Colen

PA I.D. # 21833

Andrew E. Falsetti

PA I.D. # 90856

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**Counterclaim Plaintiff**

**NARTRON CORPORATION**

represented by **Mark D. Chuey**  
 (See above for address)  
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**ATTORNEY TO BE NOTICED**

**Mark A. Grace**  
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V.

**Counterclaim Defendant**

**QRG, LTD.**

represented by **Andrew E. Falsetti**  
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Date Filed	#	Docket Text
09/12/2006	<a href="#"><u>1</u></a>	Case transferred in from District of Western District of Pennsylvania; Case Number 2:06-CV-500. Original file with documents numbered 1-17, certified copy of transfer order and docket sheet received., filed by QRG, LTD.. (Attachments: # <a href="#"><u>1</u></a> Civil Cover Sheet # <a href="#"><u>2</u></a> Receipt# <a href="#"><u>3</u></a> Doc. 2-

			Disclosure Statement# <u>4</u> Doc. 3- Summons# <u>5</u> Doc. 4- Motion to Dismiss# <u>6</u> Proposed Order to Motion to Dismiss# <u>7</u> Doc. 5- Brief in Support to Motion to Dismiss# <u>8</u> Exhibit A# <u>9</u> Exhibit B# <u>10</u> Exhibit C# <u>11</u> Doc. 6- Notice of Appearance by Thomas C. Wettach# <u>12</u> Doc. 7- Notice; Response to Motion to Dismiss# <u>13</u> Doc. 8- Motion for Discovery# <u>14</u> Proposed Order for Motion for Discovery# <u>15</u> Exhibit 1# <u>16</u> Exhibit 2# <u>17</u> Exhibit 3# <u>18</u> Exhibit 4# <u>19</u> Exhibit 6# <u>20</u> Exhibit 7# <u>21</u> Exhibit 8# <u>22</u> Exhibit 9# <u>23</u> Exhibit 5 (Motion for Discovery)# <u>24</u> Doc. 9- Notice:Response to Motion for Discovery# <u>25</u> Doc. 10- Brief in Opp. to Motion for Discovery# <u>26</u> Exhibit A (Brief in Opp. to Discovery)# <u>27</u> Exhibit B (Brief in Opp. to Discovery)# <u>28</u> Exhibit C (Brief in Opp. for Discovery)# <u>29</u> Exhibit D- (Brief in Opp. to Discovery)# <u>30</u> Doc. 11- Order Granting Motion for Discovery# <u>31</u> Doc. 12- Brief in Opp. to Motion to Dismiss# <u>32</u> Exhibit A (Brief in Opp. to Motion to Dismiss)# <u>33</u> Exhibit B (Brief in Opp. to Motion to Dismiss)# <u>34</u> Exhibit C (Brief in Opp. to Motion to Dismiss)# <u>35</u> Declaration of Richard T. Ting# <u>36</u> Declaration of Andrew E. Falsetti# <u>37</u> Declaration of Harald Philipp# <u>38</u> Declaration of Chris Bede# <u>39</u> Doc. 3 - Motion for Leave to File a Brief in Reply# <u>40</u> Exhibit A (Motion to File Brief in Reply)# <u>41</u> Doc. 14- Response to Motion for Leave to File a Brief in Reply# <u>42</u> Supplemental Declaration of Richard Ting# <u>43</u> Doc. 15-Order Granting Motion to File Brief in Reply# <u>44</u> Doc. 16- Brief in Reply# <u>45</u> Exhibit A (Brief in Reply)# <u>46</u> Doc. 17- Order Denying Motion to Dismiss. ADDITIONAL ATTACHMENTS ADDED-TRANSFER LETTER AND DOCKET FROM WESTERN DISTRICT OF PA(s) added on 9/13/2006 (crh, ). (Entered: 09/13/2006)
09/13/2006		●	SPECIAL ADMISSION FORM SENT to Andrew E. Falsetti, Mark A. Grace & Thomas C. Wettach (crh, ) (Entered: 09/13/2006)
09/13/2006		●2	Transfer Letter to Counsel (crh, ) (Entered: 09/13/2006)
09/20/2006		●3	NOTICE:A Case Mgmnt Conf has been set for 10/24/2006 @ 9:15 AM before Honorable Sylvia H. Rambo. This conference is by phone and the call is to initiated by the pltf. unless otherwise agreed upon. A joint case mgmnt plan is to be filed n/l/t 10/17/06.(ma, ) (Entered: 09/20/2006)
09/21/2006		●4	PETITION FOR SPECIAL ADMISSION (PRO HAC VICE) by Andrew E. Falsetti on behalf of QRG, LTD. Attorney Andrew E. Falsetti is seeking special admission. Filing Fee: 25.00 Receipt Number: 111 146455 (Attachments: # <u>1</u> Receipt) (jc) (Entered: 09/21/2006)
09/21/2006		●5	PETITION FOR SPECIAL ADMISSION (PRO HAC VICE) by Gene A. Tabachnick on behalf of QRG, LTD. Attorney Gene A. Tabachnick is seeking special admission. Filing Fee: 25.00 Receipt Number: 111 146455 (Attachments: # <u>1</u> Receipt) (jc) (Entered: 09/21/2006)
09/21/2006		●6	NOTICE of Appearance by Robert B. Hoffman on behalf of QRG, LTD. (Hoffman, Robert) (Entered: 09/21/2006)
09/22/2006		●7	SPECIAL ADMISSIONS FORM APPROVED as to Andrew Falsetti, Esq. on behalf of ORG, LTDSigned by Judge Sylvia H. Rambo on



		09/22/06. (ma, ) (Entered: 09/22/2006)
09/22/2006	<u>8</u>	SPECIAL ADMISSIONS FORM APPROVED as to Gene Tabachnick, Esq. on behalf of QRG, LTD Signed by Judge Sylvia H. Rambo on 09/22/06. (ma, ) (Entered: 09/22/2006)
09/29/2006	<u>9</u>	PETITION FOR SPECIAL ADMISSION (PRO HAC VICE) by Mark D. Chuey on behalf of NARTRON CORPORATION Attorney Mark D. Chuey is seeking special admission. Filing Fee: 25.00 Receipt Number: 111 146486 (crh, ) (Entered: 09/29/2006)
09/29/2006	<u>10</u>	PETITION FOR SPECIAL ADMISSION (PRO HAC VICE) by Robert C.J. Tuttle on behalf of NARTRON CORPORATION Attorney Robert C.J. Tuttle is seeking special admission. Filing Fee: 25.00 Receipt Number: 111 146485. (crh, ) (Entered: 09/29/2006)
10/02/2006	<u>11</u>	SPECIAL ADMISSIONS FORM APPROVED as to Mark D. Chuey, Esq. on behalf of Nartron/Signed by Judge Sylvia H. Rambo on 10/02/06. (ma, ) (Entered: 10/02/2006)
10/02/2006	<u>12</u>	SPECIAL ADMISSIONS FORM APPROVED as to Robert Tuttle, Esq. on behalf of Nartron.Signed by Judge Sylvia H. Rambo on 10/02/06. (ma, ) (Entered: 10/02/2006)
10/06/2006	<u>13</u>	ANSWER to Complaint by NARTRON CORPORATION. (Attachments: # <u>1</u> Exhibit(s) A# <u>2</u> Exhibit(s) B)(Bradley, Jill) (Entered: 10/06/2006)
10/17/2006	<u>14</u>	CASE MANAGEMENT PLAN by QRG, LTD.. (Falsetti, Andrew) (Entered: 10/17/2006)
10/18/2006	<u>15</u>	PETITION FOR SPECIAL ADMISSION (PRO HAC VICE) by Mark A. Grace on behalf of NARTRON CORPORATION Attorney Mark A. Grace is seeking special admission. Filing Fee: 25.00 Receipt Number: 111 146621. (crh, ) (Entered: 10/18/2006)
10/18/2006	<u>16</u>	PETITION FOR SPECIAL ADMISSION (PRO HAC VICE) by Thomas C. Wettach on behalf of NARTRON CORPORATION Attorney Thomas C. Wettach is seeking special admission. Filing Fee: 25.00 Receipt Number: 111 146621. (crh, ) (Entered: 10/18/2006)
10/19/2006	<u>17</u>	SPECIAL ADMISSIONS FORM APPROVED as to Mark Grace, Esq. on behalf of Nartron Signed by Judge Sylvia H. Rambo on 10/19/06. (ma, ) (Entered: 10/19/2006)
10/19/2006	<u>18</u>	SPECIAL ADMISSIONS FORM APPROVED as to Thomas Wettach, Esq. on behalf of Nartron Signed by Judge Sylvia H. Rambo on 10/19/06. (ma, ) (Entered: 10/19/2006)
10/24/2006	<u>20</u>	ORDER - STANDARD CASE MANAGEMENT TRACK Case placed on the 08/2007 trial list. Cases on this list are scheduled to begin on 9/4/2007 following all j/s's starting at 9:30 AM. A date certain may be discussed at the PTC which is set for 8/17/2007 @ 1:30 PM; Discovery due by 2/28/2007. Dispositive Mtns due by 6/20/2007. PTMs due by

		8/10/2007. See order for other ddls. Signed by Judge Sylvia H. Rambo on 10/24/06. (ma, ) (Entered: 10/24/2006)
11/01/2006	● <u>21</u>	MOTION to Dismiss <i>Pursuant to Fed.R.Civ.P. 12(b)(1)</i> by NARTRON CORPORATION. (Attachments: # <u>1</u> Certificate of Compliance With Local Rule 7.1# <u>2</u> Proposed Order)(Grace, Mark) (Entered: 11/01/2006)
11/01/2006	● <u>22</u>	BRIEF IN SUPPORT re <u>21</u> MOTION to Dismiss <i>Pursuant to Fed.R.Civ.P. 12(b)(1)</i> filed by NARTRON CORPORATION. (Attachments: # <u>1</u> Declaration of John E. Nemazi# <u>2</u> Exhibit(s) A - G) (Grace, Mark) (Entered: 11/01/2006)
11/16/2006	● <u>23</u>	BRIEF IN OPPOSITION re <u>21</u> MOTION to Dismiss <i>Pursuant to Fed.R.Civ.P. 12(b)(1)</i> filed by QRG, LTD.. (Attachments: # <u>1</u> Affidavit /Declaration of Harald Philipp# <u>2</u> Exhibit(s) 1# <u>3</u> Exhibit(s) 2# <u>4</u> Exhibit(s) 3# <u>5</u> Exhibit(s) 4# <u>6</u> Exhibit(s) 5# <u>7</u> Exhibit(s) 6# <u>8</u> Exhibit(s) 7)(Falsetti, Andrew) (Entered: 11/16/2006)
11/27/2006	● <u>24</u>	REPLY BRIEF re <u>21</u> MOTION to Dismiss <i>Pursuant to Fed.R.Civ.P. 12(b)(1)</i> filed by NARTRON CORPORATION. (Attachments: # <u>1</u> Exhibit(s) 1)(Grace, Mark) (Entered: 11/27/2006)
11/30/2006	● <u>25</u>	MOTION to Clarify <i>The Case Caption</i> by QRG, LTD.. (Attachments: # <u>1</u> Certificate of Compliance with Local Rule 7.1# <u>2</u> Proposed Order) (Falsetti, Andrew) (Entered: 11/30/2006)
12/01/2006	● <u>26</u>	BRIEF IN SUPPORT re <u>25</u> MOTION to Clarify <i>The Case Caption</i> filed by QRG, LTD..(Falsetti, Andrew) (Entered: 12/01/2006)
12/01/2006	● <u>27</u>	ORDER deferring ruling on Motion to Clarify <u>25</u> pending decision on dft's mtn to dismissSigned by Judge Sylvia H. Rambo on 12/01/06 (ma, ) (Entered: 12/01/2006)
02/12/2007	● <u>29</u>	NOTICE by QRG, LTD. of <i>Dismissal of Related Action</i> (Attachments: # <u>1</u> Appendix Eastern District of Michigan Order and Opinion Granting Motion to Dismiss)(Falsetti, Andrew) (Entered: 02/12/2007)
03/02/2007	● <u>30</u>	MEMORANDUM AND ORDER: Denying in part dft's mtn to dismiss <u>21</u> as follows: a) The Court will reserve ruling with regard to the "capacitivetouch sensor products and related components" issue and grant Pltf lv to amend the complaint on or before 4/2/07.b) Mtn is denied in all other respects.2) Pltf's Mtn to Clarify the Case Caption <u>25</u> is GRANTED. The Clrk shall change the case caption as to pltf to read: "QRG, Ltd., a/k/a Quantum Research Group,Ltd., Plaintiff." All future filings shall display this caption. 3) An amended cmo will follow.Signed by Judge Sylvia H. Rambo on 03/02/07 (ma, ) (Entered: 03/02/2007)
03/02/2007	● <u>31</u>	AMENDED CASE MANAGEMENT ORDER: J/S and Trial continued to the 10/1/2007 list beginning at 9:30 AM before Honorable Sylvia H. Rambo. Discovery due by 3/30/2007. Dispositive Mts ddl 7/20/2007. PTMs due by 9/7/2007. PTC rescheduled for 9/14/2007 @ 10:00 AM before Honorable Sylvia H. Rambo. See order for other ddls.Signed by Judge Sylvia H. Rambo on 03/02/07. (ma, ) (Entered: 03/02/2007)

03/08/2007	● <u>32</u>	AMENDED COMPLAINT against NARTRON CORPORATION, filed by QRG, LTD..(Falsetti, Andrew) (Entered: 03/08/2007)
03/19/2007	● <u>33</u>	ANSWER to Amended Complaint, COUNTERCLAIM against all defendants by NARTRON CORPORATION.(Grace, Mark) (Entered: 03/19/2007)
03/20/2007	●	Correction made to docket sheet to reflect QRG, LTD. as the Counterclaim Defendant with appropriate counsel listed as per the 3/19/07 Amended Complaint and Counterclaim <u>33</u> . (dfm ) (Entered: 03/20/2007)
03/23/2007	● <u>34</u>	MOTION to Strike <i>Counterclaim</i> by QRG, LTD.. (Attachments: # <u>1</u> Exhibit(s) A# <u>2</u> Exhibit(s) B# <u>3</u> Exhibit(s) C# <u>4</u> Exhibit(s) D# <u>5</u> Brief in Support# <u>6</u> Proposed Order)(Falsetti, Andrew) (Entered: 03/23/2007)
03/26/2007	● <u>35</u>	BRIEF IN SUPPORT re <u>34</u> MOTION to Strike <i>Counterclaim</i> filed by QRG, LTD..(Falsetti, Andrew) (Entered: 03/26/2007)
03/29/2007	● <u>36</u>	REPLY BRIEF re <u>34</u> MOTION to Strike <i>Counterclaim</i> filed by NARTRON CORPORATION. (Attachments: # <u>1</u> Exhibit(s) A# <u>2</u> Exhibit(s) B# <u>3</u> Exhibit(s) C - Part 1# <u>4</u> Exhibit(s) C - Part 2# <u>5</u> Exhibit(s) D# <u>6</u> Exhibit(s) E# <u>7</u> Exhibit(s) F# <u>8</u> Exhibit(s) G# <u>9</u> Exhibit(s) H# <u>10</u> Exhibit(s) I)(Grace, Mark) (Entered: 03/29/2007)
03/29/2007	● <u>37</u>	CERTIFICATE of of Compliance by NARTRON CORPORATION re <u>36</u> Reply Brief,. (Grace, Mark) (Entered: 03/29/2007)
04/12/2007	● <u>38</u>	REPLY BRIEF re <u>34</u> MOTION to Strike <i>Counterclaim</i> filed by QRG, LTD..(Falsetti, Andrew) (Entered: 04/12/2007)
04/23/2007	● <u>39</u>	MEMORANDUM AND ORDER denying pltf's Motion to Strike <u>34</u> . Signed by Judge Sylvia H. Rambo on 04/23/07 (ma, ) (Entered: 04/23/2007)
04/23/2007	● <u>40</u>	NOTICE: A scheduling Conference has been scheduled for 5/10/2007 @ 9:00 AM before Honorable Sylvia H. Rambo. This conference is by phone with the call to be initiated by the pltf. Signed by Judge Sylvia H. Rambo on 04/23/07. (ma, ) (Entered: 04/23/2007)
05/07/2007	● <u>41</u>	REPLY/ ANSWER to Counterclaim for <i>Patent Infringement</i> by QRG, LTD..(Falsetti, Andrew) (Entered: 05/07/2007)
05/07/2007	● <u>42</u>	MOTION for Partial Summary Judgment on Plaintiff QRG's <i>Declaratory Judgment Claim for Unenforceability of The Five Nartron Patents-In-Suit</i> by NARTRON CORPORATION.(Grace, Mark) (Entered: 05/07/2007)
05/07/2007	● <u>43</u>	STATEMENT OF FACTS re <u>42</u> MOTION for Partial Summary Judgment on Plaintiff QRG's <i>Declaratory Judgment Claim for Unenforceability of The Five Nartron Patents-In-Suit</i> filed by NARTRON CORPORATION. (Attachments: # <u>1</u> Index of Exhibits# <u>2</u> Exhibit(s) A# <u>3</u> Exhibit(s) B# <u>4</u> Exhibit(s) C)(Grace, Mark) (Entered: 05/07/2007)

05/07/2007	● <u>44</u>	BRIEF IN SUPPORT re <u>42</u> MOTION for Partial Summary Judgment on Plaintiff QRG's Declaratory Judgment Claim for Unenforceability of The Five Nartron Patents-In-Suit filed by NARTRON CORPORATION. (Grace, Mark) (Entered: 05/07/2007)
05/07/2007	● <u>45</u>	EXHIBIT A to Brief in Support by NARTRON CORPORATION re <u>44</u> Brief in Support. (Grace, Mark) (Entered: 05/07/2007)
05/07/2007	● <u>46</u>	EXHIBIT PROPOSED ORDER by NARTRON CORPORATION re <u>42</u> MOTION for Partial Summary Judgment on Plaintiff QRG's Declaratory Judgment Claim for Unenforceability of The Five Nartron Patents-In-Suit. (Grace, Mark) (Entered: 05/07/2007)
05/07/2007	● <u>47</u>	MOTION for Partial Summary Judgment that the Nartron Patents-In-Suit Are Not Invalid by NARTRON CORPORATION. (Attachments: # <u>1</u> Proposed Order)(Grace, Mark) (Entered: 05/07/2007)
05/07/2007	● <u>48</u>	STATEMENT OF FACTS re <u>47</u> MOTION for Partial Summary Judgment that the Nartron Patents-In-Suit Are Not Invalid filed by NARTRON CORPORATION. (Attachments: # <u>1</u> Index# <u>2</u> Exhibit(s) A# <u>3</u> Exhibit(s) B# <u>4</u> Exhibit(s) C# <u>5</u> Exhibit(s) D# <u>6</u> Exhibit(s) E)(Grace, Mark) (Entered: 05/07/2007)
05/07/2007	● <u>49</u>	BRIEF IN SUPPORT re <u>47</u> MOTION for Partial Summary Judgment that the Nartron Patents-In-Suit Are Not Invalid filed by NARTRON CORPORATION. (Attachments: # <u>1</u> Exhibit(s) A)(Grace, Mark) (Entered: 05/07/2007)
05/08/2007	● <u>50</u>	CERTIFICATE of Compliance with Word-Count Limit by NARTRON CORPORATION re <u>44</u> Brief in Support. (Grace, Mark) (Entered: 05/08/2007)
05/08/2007	● <u>51</u>	CERTIFICATE of Compliance with Word-Count Limit by NARTRON CORPORATION re <u>49</u> Brief in Support. (Grace, Mark) (Entered: 05/08/2007)
05/08/2007	●	Pursuant to the Local Rules and ECF User Manual, all motions and briefs should be filed simultaneously with their corresponding proposed orders, exhibits and any certificates as attachments to the main documents and not as individual documents. (dfm ) (Entered: 05/08/2007)

